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April 17, 2020

Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Irizarry, et al.*
Docket No.: 20-CR-127

Dear Judge Woods:

I am CJA counsel to Defendant Christian Irizarry in the above referenced case. I was appointed to represent Mr. Irizarry on February 18, 2020. I write to respectfully ask the Court to appoint Chase Ruddy, Esq., as associate CJA counsel to Mr. Irizarry *nunc pro tunc* to February 18, 2020.

While this is only a two-defendant case, there was a lengthy investigation, and the government has already turned over a substantial amount of discovery including surveillance video, recorded purchases of narcotics, Title III wiretaps, social media and other categories of evidence.

Mr. Irizarry remains detained at the MCC New York, and the task of communicating with him and reviewing with him the extensive discovery in this case is and will continue to be a significant undertaking, especially as we continue to adapt to the changing conditions presented by COVID-19.

Mr. Ruddy has already done a significant amount of work behind-the-scenes to assist me with Mr. Irizarry's case. Mr. Ruddy is an experienced attorney who has worked for my firm since September 2011. He has been admitted to practice in the Southern and Eastern Districts of New York, and the District of New Jersey, for more than seven years and has worked on well over 100 federal criminal cases with me, including numerous CJA matters. He has previously been appointed as associate CJA counsel in this district, including in a recent case before Judge Preska (*United States v. Nikoloz Jikia*, 17-CR-350). He has extensive experience litigating federal criminal cases and his work on this case has already greatly aided Mr. Irizarry (and me), and will continue to do so, while representing a cost saving measure to the Court.

Given the challenges posed personally and professionally by the COVID-19 pandemic, this request was not made closer in time to my appointment. I ask that the Court grant it now *nunc pro tunc*

so that the work already performed by Mr. Ruddy may be recognized. If the Court is inclined to grant this request, I respectfully request that Mr. Ruddy be appointed at the associate rate of \$110 per hour.

I thank Your Honor for your consideration and wish everyone well.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

Application denied without prejudice. It is the Court's preference to approve adjunct counsel for a particular number of hours, which can be reevaluated before the cap is reached if necessary. This application does not provide information regarding the number of hours that the proposed adjunct counsel has already dedicated to this case, or an estimate regarding any additional time that he may spend. Any renewed application should provide that information. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 21.

SO ORDERED
April 18, 2020



GREGORY H. WOODS
United States District Judge